

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MOBILE HEALTH INNOVATIVE
SOLUTIONS, LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:24-CV-00106-JRG

JURY TRIAL DEMANDED

**JOINT MOTION FOR EXTENSION OF
TIME TO FILE PROPOSED DISCOVERY ORDER**

Plaintiff Mobile Health Innovative Solutions, LLC (“Mobile Health”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“Samsung”) (collectively, “the Parties”) respectfully file this Joint Motion for Extension of Time to File Proposed Discovery Order and would show the Court as follows:

Pursuant to the Court’s Order Granting Samsung’s Unopposed Motion for Extension of Time to File Proposed Docket Control Order, Proposed Discovery Order, and Proposed Protective Order (Dkt. No. 12), the deadline for the Parties to file their Proposed Discovery Order is June 19, 2024. At this time, the Parties request that the Court briefly extend the deadline for the Parties to file their Proposed Discovery Order up to and including June 26, 2024.¹

¹ This extension does not affect the deadline for the Parties to file their Proposed Docket Control Order. The Parties, concurrently herewith, are filing their agreed-to Proposed Docket Control Order on June 19, 2024.

Good cause exists for this brief one-week extension. The Parties have worked diligently to finalize the Proposed Discovery Order and have made progress since the initial extension (Dkt. No. 11), but the Parties have not resolved all remaining disputes. This brief extension up to and including June 26, 2024, will promote judicial efficiency by ensuring that the Parties have adequate time to meet and confer to narrow and/or eliminate the remaining disputes for which the Court will have to resolve.

The Parties represent that this Motion is not sought for the purposes of delay but rather so that justice may be served. The Parties have met and conferred and are jointly seeking the relief sought in this Motion.

Accordingly, the Parties respectfully requests that the Court grant this Joint Motion and enter an order extending the deadline in which the Parties are required to file their Proposed Discovery Order from June 19, 2024, up to and including June 26, 2024.

Dated: June 19, 2024

Respectfully submitted,

/s/ Randall T. Garteiser

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Attorney for Defendants
Samsung Electronics Co., Ltd. and
Samsung Electronics America, Inc.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Samsung met and conferred with counsel for Mobile Health to discuss the substantive relief sought in this Motion pursuant to Local Rule CV-7(h). The Parties are jointly seeking the relief sought in this Motion.

/s/ Melissa R. Smith

Melissa R. Smith

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on June 19, 2024, all counsel of record who are deemed to have consented to electronic service are being served with a true and correct copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Melissa R. Smith

Melissa R. Smith